

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

MAX MINDS, LLC,

Plaintiff,

v.

TRIANGLE EXPERIENCE GROUP, INC.,
ROBERT CLARE, JEFFREY MASE,
KEVIN MULLICAN, and JOHN DOES 1-10,

Defendants.

CAUSE NO. 1:24-cv-00779-MPB-MKK

JURY TRIAL DEMANDED

DECLARATION OF J. CAMPBELL MILLER

I, J. Campbell Miller, declare and say:

1. I am an attorney duly licensed to practice before this Court, and I am counsel for Plaintiff Max Minds, LLC (“Max”) in the above-captioned matter. I make this Declaration, which is filed in support of Max’s Amended Motion for Preliminary Injunction, and I could and would testify competently to the matters set forth herein.

2. Attached hereto as **Exhibit 1** is a true and correct copy of a Deposition Excerpt from the Deposition of Robert Clare.

3. Attached hereto as **Exhibit 2** is a true and correct copy of a Deposition Excerpt from the Deposition of Kevin Mullican.

4. Attached hereto as **Exhibit 3** is a true and correct copy of Exhibit 1 used in the Deposition of Robert Clare.

5. Attached hereto as **Exhibit 4** is a true and correct copy of Exhibit 11 used in the Deposition of Robert Clare.

6. Attached hereto as **Exhibit 5** is a true and correct copy of Exhibit 29 used in the Deposition of Robert Clare.

7. Attached hereto as **Exhibit 6** is a true and correct copy of Exhibit 30 used in the Deposition of Robert Clare.

8. Attached hereto as **Exhibit 7** is a true and correct copy of Exhibit 31 used in the Deposition of Rober Clare.

9. Attached hereto as **Exhibit 8** is a true and correct copy of Exhibit 32 used in the Deposition of Robert Clare.

10. Attached hereto as **Exhibit 9** is a true and correct copy of Exhibit 34 used in the Deposition of Robert Clare.

11. Attached hereto as **Exhibit 10** is a true and correct copy of Exhibit 35 used in the deposition of Robert Clare.

12. Attached hereto as **Exhibit 11** is a true and correct copy of Exhibit 36 used in the deposition of Robert Clare.

13. Attached hereto as **Exhibit 12** is a true and correct copy of Exhibit 37 used in the deposition of Kevin Mullican.

14. Attached hereto as **Exhibit 13** is a true and correct copy of Exhibit 38 used in the deposition of Kevin Mullican.

15. Attached hereto as **Exhibit 14** is a true and correct copy of Exhibit 39 used in the deposition of Kevin Mullican.

16. Attached hereto as **Exhibit 15** is a true and correct copy of Exhibit 40 used in the deposition of Kevin Mullican.

17. Attached hereto as **Exhibit 16** is a true and correct copy of Triangle Experience, Inc.'s Second Amended Verified Answers and Objections to Max's Interrogatories in this case.

18. Attached hereto as **Exhibit 17** is a true and correct copy of Max Minds, LLC's First Amended Verified Answers and Objections to TEG's Interrogatories in this case.

19. Attached hereto as **Exhibit 18** is a true and correct copy of the Expert Report of Robert Zeidman.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 26, 2024.

/s/ J. Campbell Miller
J. CAMPBELL MILLER